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**Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation.*,
U.S. District Court for the District of New Jersey; Case No. 1:19-md-02875-
RBK-JS**

Dear Counsel:

On behalf of Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, Actavis Pharma, Inc., and Arrow Pharm (Malta) Ltd.¹ (collectively, “the **Teva Defendants**”) we write to confirm that, consistent with accepted practices, Plaintiffs understand that the Teva Defendants will be utilizing a continuous multi-modal learning (“CMML”) platform

¹ Undersigned counsel notes that Arrow Pharm (Malta) Ltd. has not been served, and no longer exists as a separate legal entity. This correspondence does not represent Arrow Pharm (Malta) Ltd. or any successor in interest’s consent to jurisdiction in this or any underlying matter, and Arrow Pharm (Malta) Ltd. and its successor in interest specifically reserve the right to raise any and all defenses, jurisdictional or otherwise.

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to assist Defendants with review and production of the Teva Defendants' electronically stored information ("ESI").

As you may know, CMML is a machine-learning technology that enables a computer to prioritize relevant documents based on limited human input. CMML will not only accelerate document productions and reduce costs but will work to ensure that Plaintiffs receive responsive materials in accordance with the Court's July 15th initial production deadline.

To be clear, the Teva Defendants will be reviewing documents produced to Plaintiffs before they are turned over but will be leveraging the CMML system to prioritize which documents should be reviewed first. If, at some point, the CMML system is indicating that there is a population of documents unlikely to be responsive (such that it will be unduly burdensome for the Teva Defendants to review them), we will inform Plaintiffs of the same.

Given that productions of ESI are only just beginning, we are happy to discuss and answer any questions Plaintiffs may have on the front end of this process. Otherwise, we trust that our approach comes as no surprise to Plaintiffs and is acceptable given the volume of data involved in this litigation.

Very truly yours,

/s/ Brian H. Rubenstein
Brian H. Rubenstein, Esq.
*Attorney for Teva Pharmaceuticals USA,
Inc., Teva Pharmaceutical Industries Ltd.,
Actavis LLC, and Actavis Pharma, Inc.*

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